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November 13, 2007
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: October 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Surface soil samples collected from 17 locations on off-site Lots 19 and 20, as part of residential soil investigation activities, were analyzed for lead in accordance with your September 6, 2007 letter. Validation of the laboratory data from these analyses and evaluation of the analytical data was performed. An e-mail transmitting these data and proposing that the residential soil investigation had been completed was sent to you on October 10, 2007.
 - Subtask 6.5 – Evaluation of Phase 1 and 2 groundwater data was performed and a letter proposing Phase 3 groundwater investigation activities was sent to you on October 12, 2007.
 - Subtask 6.7 – Evaluation of Phase 1 and 2 wetland sediment data was performed.



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2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
 - The unvalidated laboratory analytical report for the Lots 19 and 20 surface soil sample analyses described above is provided in electronic form on the enclosed DVD.
 - The validation report for these Lots 19 and 20 surface soil sample analyses is provided in electronic form on the enclosed DVD.
 - The updated database, including all data validated through October 31, 2007 is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through Phase 2 soil sample collection and analyses, data validation, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through Phase 3 monitoring well installation and development, groundwater sampling and analysis, data validation, hydraulic testing, and data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through data evaluation, sample collection and analyses, and data validation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 60% complete. No delays were encountered this month.

Although not required by the UAO, an alternative project schedule was submitted to you on October 18, 2007 in response to your request. This alternative schedule was based on use of a removal action approach for performance of remaining project activities to obtain construction completion by September 30, 2008, coupled with a partial delisting of the Site.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

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cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Robert L. Iuliucci - Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP